

REASONS FOR REQUESTING PRE-APPEAL BRIEF REVIEW

Appellants hereby submit this Pre-Appeal Brief in connection with the above-identified application. A Notice of Appeal was filed on December 29, 2006.

Status of the Claims

Claims 1-13 and 15-23 remain as originally submitted.

Claim 14 remains as previously presented.

Claims 1-23 are currently pending following this response.

Remarks and Arguments are provided below.

Summary of the Claimed Subject Matter

The specification is directed to loading realistic test data into a database in a test environment. Using a data loading tool, data is read from a system database and copied into a test database (Specification, paragraph [0022]); hereinafter, citation to the Specification takes the form ([paragraph]). The data loading tool comprises an initialization component, a control generator, an extractor component, and a loader component ([0027]). The initialization component receives a request for data and identifies the requested data using a first key ([0029], [0030]). The initialization component identifies any data relationally associated with the requested data using one or more keys related to the first key in the system database ([0032], [0033]). The initialization component then generates a load file indicating a record of the table, key, and any corresponding data for each requested data record. By using the first key and one or more keys related to the first key the data maintains its relational integrity in the load file ([0035], [0037]-[0038]). The control generator generates control files for extracting and/or loading data from the system database to the test database ([0039]-[0040]). The extractor component utilizes the load file to extract the requested and

related data from the system database ([0041]-[0043]) and the loader component loads the extracted data into the test database based on the generated control files ([0044]-[0045]).

Grounds of Rejection to be Reviewed

Whether claims 1-23 are anticipated under 35 U.S.C. 102(e) by Sachse et al (U.S. Patent No. 6,985,901).

Argument

I. Sachse does not disclose the claimed initialization component.

Claim 1 recites, "an initialization component operable to use data and a key of a first table of a database to generate a load file identifying at least one key related to the key of the first table and data associated with the at least one key". Claims 11 and 19 recite similar limitations.

The Final Office Action refers to column 34, lines 46-54 of Sachse to teach the above recited limitations. It is noted that the above identified section of Sachse discloses that since surrogate keys are used to uniquely identify records, a look-up process is performed. As was known to one skilled in the art at the time of the invention, surrogate keys are keys that are not derived from any data in the database. Referring to the look-up process disclosed by Sachse, there is only disclosure that surrogate key information is extracted from a database to flat files. The flat files may be used to generate other flat files in a format that can be loaded into the database. It is assumed that the Examiner is interpreting the surrogate keys as the claimed "key of a first table". As required by the claims, the "key of a first table" is used to generate the load file. The only file generated using the surrogate keys are the flat files as discussed

above. There is no disclosure that the flat files that were generated by extracting surrogate key information identifies "at least one key related to" the surrogate keys and "data associated with the one key" as required in claim 1. As claimed, data that is to be loaded into a test database is extracted from a database based on the load file. There is no disclosure that the flat files that were generated by extracting the surrogate key information are used to extract data from the database.

II. Sachse does not disclose the claimed extractor component.

Claim 1 recites, "an extractor component operable to extract data from the database based on the load file". Claims 11 and 19 recite similar limitations.

In reference to the disclosure in column 55, lines 60-64 and column 57, lines 40-44, Applicants recognize that Sachse does disclose to use keys to load data. However, this disclosure is directed to a script that is used to load data into a database, and is not directed to extracting data based on a load file that identifies at least one key related to the key of the first table as required by the claims. The Examiner recited similar disclosures of Sachse loading data into a database in the Advisory action, however this disclosure is not directed to extracting data based on a load file that identifies at least one key related to the key of the first table as required by the claims.

The Examiner also stated in the Advisory Action that "if a script is being run to load data it would be usable for data extraction from a database". Appellants respectfully submit that it is unclear as to how a script designed for loading data can be used to extract data. Further, there does not appear to be any teaching or suggestion in Sachse for such a modification. Still further, it is noted that claim 1 was rejected under 35 U.S.C. 102(e).

In reference to the disclosure in column 50, lines 36-39, Sachse discloses to use a script, which is defined in the sections cited above, that may be run to load data into the database. There is no teaching or suggestion in Sachse for using this script to extract data from the database.

The Final Office Action also referred to column 67, lines 13-20. In this section Sachse discloses a `table_extract` script that extracts data from a database table and writes it to a flat file in a comma delimited format. Sachse further discloses in this section that the "script can be configured to extract data from as many tables as required." Sachse further discloses the process for extracting data using the `table_extract` script in column 67, line 34 – column 68, line 40. As disclosed by Sachse, the `table_extract` script requires `table_name` of each table that is to be extracted and any applicable filters. Sachse does not provide any disclosure of how the table names that are to be extracted are identified. More particularly, there is no disclosure that the table names that are to be extracted are based on the flat file generated by extracting surrogate key information.

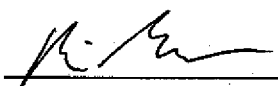
As discussed above, the present disclosure enables data to be extracted from a database while maintaining its relational integrity. This is accomplished by an initialization component using a first key to generate a load file that identifies other keys related to the first key. Data is then extracted from the database in accordance with the load file to maintain the relational integrity. Sachse does not provide any disclosure of extracting data while maintaining its relational integrity and does not provide any disclosure of extracting data from a database using a load file that identifies other keys related to the first key.

Appellants respectfully submit that the rejection of record should be rescinded in light of the arguments presented above. If the Examiner has any questions or comments or otherwise feels it would be helpful in expediting the application, he is encouraged to telephone the undersigned at (972) 731-2286.

Respectfully submitted,
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PRE-APPEAL BRIEF REQUEST FOR REVIEW

Docket Number (Optional)

IDF 2279 (4000-11900)

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on 11/5/07

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Typed or printed name Jean Brown

Application Number

10/652,264

Filed

August 29, 2003

First Named Inventor

Rajendra P. Cheedella

Art Unit

2166

Examiner

Navneet K. Ahluwalia

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).

Note: No more than five (5) pages may be provided.

I am the

☐ applicant/inventor.

☐ assignee of record of the entire interest.
See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed.
(Form PTO/SB/96)

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Registration number if acting under 37 CFR 1.34 _____

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11/3/2007

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NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below*.

☒ *Total of 1 forms are submitted.

This collection of information is required by 35 U.S.C. 132. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11, 1.14 and 41.6. This collection is estimated to take 12 minutes to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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